

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Equal Access and Interconnection)

Obligations Pertaining to)

Commercial Mobile Services)

CC Docket No. 94-54

RM-8012

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MCI COMMENTS

MCI TELECOMMUNICATIONS CORPORATION

Larry A. Blosser
Donald J. Elardo
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
(202) 887-2727

Its Attorneys

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Summary

MCI continues to believe, as it did when it filed its Petition for Rulemaking in 1992, that the many benefits that equal access has brought to wired telephony must be extended to cellular subscribers and to subscribers to other services in the CMRS family, including broadband PCS and wide area (or enhanced) SMR. The explosive growth of the cellular subscriber base, plus the prospects for even more rapid growth in wireless services over the next several years, more than ever warrants the extension of equal access requirements, in the interest of consumer choice.

Equal access enables both consumer and business subscribers to realize their objectives. Consumers buying cellular service today for convenience and safety are more price-conscious than the early generation of mobility-at-almost-any-price customers. Market research shows that potential broadband PCS customers want a go-anywhere phone. The prototype PCS phone today resembles a cordless phone handset, and it may operate like one when within range of a home base station or business PBX. It should function just like a cordless phone when in the "public" environment; in public, as within range of the home base station or PBX, the CMRS phone should provide 1+ access to the subscriber's preferred IXC.

Business customers are also becoming increasingly conscious of the need to control cellular costs and to reduce their exposure to fraud. With cellular equal access, business customers can access IXC service platforms, such as MCI Vnet, from cellular phones.

This makes calling from the road easier, by providing access to company dialing plans (such as 8+7 digits for internal calls). MCI Vnet enables companies to customize calling plans for each cellular user by using range privileges or ID codes. By tracking ID codes against a database, Vnet Cellular helps companies protect themselves against fraudulent cellular-originated calls.

The Commission should establish existing LATAs as the equal access boundary for wireless-originated calls subject to equal access requirements. In a mass CMRS market, even more than in today's cellular market, the vast majority of calls will originate in the subscriber's home area (LATA) and probably terminate there as well. As a general rule, a call originated by a CMRS subscriber in one LATA and terminated in another LATA should be routed via the subscriber's preferred interexchange carrier. Adopting a different equal access framework for providers of wireless access services than the one which applies to traditional wireline telephone companies would only postpone the inevitable day of reckoning when the Commission must consider establishing "regulatory parity II" for all access providers -- wired and wireless.

LEC-to-CMRS Interconnection. MCI believes that LECs' interconnection offerings for CMRS must be tariffed. Tariffed interconnection offerings will assist in minimizing unlawful discrimination. LECs must be required to provide any appropriate form of interconnection upon request; CMRS providers are entitled to purchase wireless interconnection, end-user or other offerings appropriate to their needs. Non-discrimination is the

key, and the Commission must stand ready to enforce this requirement quickly and decisively. MCI has previously expressed its support for the extension of co-carrier status, including mutual compensation, to all CMRS providers, and urges the Commission to reaffirm and implement this policy.

CMRS-to-CMRS Interconnection. CMRS providers are presumptively common carriers. They should be required to interconnect with any other common carrier (including other CMRS providers) upon reasonable request pursuant to Section 201(a) of the Act.

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MCI COMMENTS

MCI Telecommunications Corporation (MCI), by its attorneys, hereby submits its initial comments in response to the Commission's Notice of Proposed Rulemaking and Notice of Inquiry (NPRM) in the above-captioned proceeding. As will be demonstrated herein, the Commission should promptly implement equal access requirements for cellular licensees and for all similarly-situated providers of commercial mobile radio services (CMRS). In addition, the requirements for LEC interconnection with CMRS providers should be strengthened and rigorously enforced. Finally, the Commission should expeditiously adopt policies and rules governing CMRS-to-CMRS interconnection. Those policies and rules should be based upon the traditional common carriage principles set forth in Sections 201 through 205 of the Communications Act.

I. INTRODUCTION

On June 2, 1992, MCI filed the petition for rulemaking which ultimately resulted in the issuance of the Commission's Notice of Proposed Rulemaking in this docket. In that petition and in later-filed reply comments, MCI urged the Commission to adopt uniform, nationwide, equal access policies and procedures applicable to all

cellular carriers.

MCI continues to believe, as it did when it originally proposed the rulemaking, that the many benefits that equal access has brought to wired telephony must be extended to all of the nineteen million cellular subscribers, and to subscribers to other services in the CMRS family, including broadband PCS and wide area (or enhanced) SMR. Indeed, what has transpired during the two-year period since MCI first proposed the rule, namely, the explosive growth in wireless services, more than ever warrants the extension of equal access requirements, in the interest of consumer choice.

II. DISCUSSION

A. Equal Access

1. Equal Access for Cellular. MCI supports the Commission's tentative conclusion that equal access requirements should be extended to all cellular licensees (NPRM para. 3). With cellular equal access, business customers can access Interexchange Carrier (IXC) service platforms, such as MCI Vnet, from cellular phones. This makes calling from the road easier, by providing access to company dialing plans (such as 8+7 digits for internal calls). MCI Vnet enables companies to customize calling plans for each cellular user by using range privileges or ID codes. By tracking ID codes against a database, Vnet Cellular helps companies protect themselves against fraudulent cellular-originated calls.

Vnet Cellular currently offers substantial cost savings, convenient billing and reporting, and enhanced call management to business customers in markets where cellular equal access is currently available. Extension of equal access requirements to all cellular carriers would permit MCI to offer these benefits to business customers nationwide, and to develop consumer-oriented products with similar features.

2. Equal Access for PCS, ESMR and other CMRS. Equal access requirements should also be applied to other similarly-situated providers of CMRS. Those CMRS services which the Commission expects to be competitive with cellular (Broadband PCS and wide area or enhanced ESMR), and which are presumptively common carrier services, should be subject to identical equal access obligations. To the extent that CMRS providers conclusively demonstrate, on the public record, that they are incapable of providing equal access due to bandwidth or other technological (but not cost) limitations, the Commission may, by rule or waiver, temporarily exempt them from equal access.^{1/} Cost should not be considered a basis for waiver or exemption, because equal access implementation can accommodate the recovery from participating IXCs of reasonable costs for equal access conversion.

3. Equal Access Boundaries. The Commission should establish existing LATAs as the equal access boundary for wireless-originated

^{1/}As soon as technological developments remove any obstacle to equal access, the exemption should be removed and the affected service providers required to satisfy consumer choice.

calls subject to equal access requirements. As a general rule, a call originated by a CMRS subscriber in one LATA and terminated in another LATA should be routed via the subscriber's preferred interexchange carrier.^{2/}

Employment of LATAs is appropriate for several reasons. First, most of the infrastructure needed to implement LATA-based wireless equal access is already in place and in use. The infrastructure elements include interexchange carrier points of presence or POPs and local exchange carrier (LEC) access tandems. Second, telephone subscribers are familiar with LATA-based equal access calling areas for wireline telephony. In many areas, telephone subscribers have a decade or more of experience with equal access based on LATAs, and the use of similar equal access areas for wireless calling would help to minimize customer confusion.

The Commission should not allow current calling scopes, such as regional cellular clusters with expansive local areas, to persist indefinitely. Broad regional calling areas permitted cellular carriers to overcome the limitations of "first generation" cellular technology and to offer service that met the mobility needs of their first customers. Those early customers were willing, for the sake of mobility, to pay high airtime rates (albeit with "bundled" system-wide calling at no extra cost). Those customers were required to forego their choice of long-distance

^{2/}Departures from LATA boundaries should be authorized only in those instances where larger territories have been approved by court order applying the community of interest standard.

carriers (within the system coverage area in all cellular markets, and nationwide as well, where the cellular provider was not subject to MFJ equal access obligations) as part of the bargain.

Customers buying cellular service today for convenience and safety are more price-conscious than the early generation of mobility-at-almost-any-price customers. Business customers are also becoming increasingly conscious of the need to control cellular costs and to reduce their fraud exposure. They also desire to provide employees access to virtual private networks. Equal access enables both consumer and business segments to realize their objectives.

Extrapolation from today's cellular market to the CMRS future suggests that wireless service will become a mass market product. Market research shows that potential broadband PCS customers want a go-anywhere phone.^{3/} In a mass CMRS market, even more than in the cellular market, the vast majority of calls will originate in the subscriber's home area (LATA) and probably terminate there as well. The prototype PCS phone today resembles a cordless phone handset, and it may operate like one when within range of a home base station or business PBX. It should function just like a cordless

^{3/} In a market survey commissioned by MCI and conducted by C&R Research in June 1993, 73% of respondents were either "somewhat interested" or "very interested" in buying a phone service which provided them with affordable, mobile communications that allowed them to be reached anytime, anywhere, and which provided the same types of features (e.g., basic CLASS features) available today on wireline instruments. Of the 1000 respondents (evenly distributed among five groups (POTS subscribers, cordless phone users, cellular users, paging subscribers and small businesses), 800 do not currently have a cellular phone.

phone when in the "public" environment; in public, as within range of the home base station or PBX, the CMRS phone should provide 1+ access to the subscriber's preferred IXC.

Given the evolution of the cellular (and future CMRS) customer base, the cellular industry has a heavy burden in seeking to demonstrate the need for continuation of multi-LATA wireless calling areas.

4. Exceptions. MCI recognizes that it may be necessary, at least initially, to exclude certain types of wireless-originated calls from equal access requirements. As indicated in paras. 73-74 of the NPRM, various parties have claimed that equal access is impracticable or impossible for certain types of wireless-originated calls. MCI recommends that the Commission review the record concerning these call types and adopt appropriate requirements for each category, never abandoning the proposition that equal access is its overarching policy objective and purpose.

In evaluating requests for waiver or exemption, the Commission might utilize a three-part classification scheme. If the record demonstrates that, for a given call type, equal access is feasible with existing or readily available technology, equal access requirements must apply. If equal access is not currently feasible, but can be implemented if further development efforts are completed, the Commission could grant a temporary (time-limited) waiver, and direct the affected carriers to develop a solution and to implement it as promptly as reasonably feasible. Only if a party seeking a waiver or exemption clearly demonstrates that equal

access is infeasible under any known technology should the equal access rules exclude that call type. And, as noted above, the waiver should be lifted when technological developments remove the basis for the waiver grant.

5. Equal Access Implementation. MCI respectfully must disagree with the Commission's tentative conclusion that the "full panoply of equal access rights that apply to landline LEC should not apply to CMRS providers" (NPRM, at para. 3.) All equal access obligations applicable to wireline carriers, MCI submits, should apply to CMRS.

Wireless services are already substitutable for wireline services in some rural areas.^{4/} The substitutability of wireless for wireline service can be expected to increase over time as additional spectrum is made available for CMRS and as costs of wireless technology continue to decline. Wireless services may some day be fully substitutable for wireline services. They may be delivered by competing providers in some markets, and by a single, unseparated telecommunications provider in others.^{5/} Adopting a

^{4/}The Public Service Commission of Wyoming (Wyoming PSC) has granted Union Telephone Company, Inc., a certificated LEC and cellular licensee, authorization to provide fixed cellular service in remote areas. See Wyoming PSC Petition for Authority to Maintain Current Regulation of Rates and Market Entry, PR File No. 94-SP8, filed August 10, 1994.

^{5/}Southwestern Bell Corporation (SBC) has proposed that 20 MHz of federal government spectrum to be reallocated for commercial use (2390-2400 MHz and 2300-2310 MHz) be earmarked exclusively for wireless local loops, which would "replace the drop wire to the home or small business, as well as a portion of the telephone distribution plant, with a low power microcellular radio system." Comments of SBC, ET Docket No. 94-32 (June 15, (continued...))

different equal access framework for providers of wireless access services than the one which applies to traditional wireline telephone companies would only postpone the inevitable day of reckoning when the Commission must consider establishing "regulatory parity II" for all access providers -- wired and wireless.

6. Forms of Access and Implementation Issues. MCI offers the following comments on paragraphs 80-100 of the NPRM, which solicit comments on the types of equal access that should be required and on various implementation issues.

a. Presubscription vs. Unblocking. MCI disagrees with those parties who contend that 1+ equal access is unnecessary, and that unblocking of 10XXX (in the future, 101XXXX), 800, or 950 would be an appropriate alternative to true equal access. Customers should have the same ability to access their preferred long distance carrier from wireless phones that they now enjoy on their landline instruments. This can best be achieved through 1+ presubscription. Implementation of 1+ presubscription also facilitates the delivery of a wider array of services, such as access to virtual private networks, that cannot be provided with equivalent convenience and security through 10XXX, 800 or other extended dialing schemes.

b. Balloting. The Commission has tentatively concluded that balloting of existing and new cellular subscribers should be required, and solicits comment on Bell Atlantic's proposal for

(...continued)
1994) at 2.

balloting.^{6/} Bell Atlantic's comments, as summarized in the NPRM, outline the key elements of a nondiscriminatory system of balloting. MCI believes that such a system should be implemented, not only for cellular carriers, but also for providers of other CMRS services which are likely to compete with cellular.

c. Allocation. The Commission observes, at para. 91, that AT&T does not have the same historical relationship with carriers in the CMRS marketplace that it enjoyed with LECs in the wireline marketplace and seeks comments on whether allocation is necessary. MCI supports allocation, among participating interexchange carriers (IXCs), of customers who fail to choose an IXC in the same proportion as the IXCs were selected through returned customer ballots. Allocation is necessary to ensure that the 1+ provider chosen by the cellular carrier (whether that is AT&T, another IXC, or the cellular carrier's resale affiliate) does not receive a windfall when subscribers fail to return ballots.

d. Equal Access Conversion. As numerous parties have noted in comments on MCI's petition and elsewhere, most cellular switches are equal-access capable today. When the BOCs have acquired non-equal access cellular properties, they have been able to convert those systems to equal access within a comparatively short period

^{6/}Bell Atlantic proposes that all existing and new customers of CMRS providers be sent a ballot and asked to choose an interexchange carrier from among participating interexchange carriers. Bell Atlantic would require that each CMRS provider list the interexchange carriers in a nondiscriminatory manner and periodically rotate the listing on a nondiscriminatory basis to ensure that each interexchange carrier has an equal chance of being listed at the top of the ballot.

of time. Based upon that experience, MCI believes that a twelve-month deadline for cellular equal access (commencing with the publication of the Commission's Report and Order in this docket) would be reasonable for existing cellular systems. Extensions should not be granted unless conversion needs to be delayed due to switch capability problems or other technical problems beyond the licensee's control.

All broadband PCS licensees and all wide area SMR/ESMR licensees (unless the latter are determined to be "grandfathered" under by the Budget Act's transition provisions) should provide equal access at the commencement of commercial service. Any "grandfathered" systems should be subject to equal access requirements promptly upon expiration of the transition period (i.e., August 10, 1996).

e. Billing and Collection Information and Related Issues.

Cellular carriers are in exclusive possession of information, including billing name and address information, that IXCs must have if they are to bill and collect for cellular originated calls. Moreover, the cellular carriers may possess (or may be able to add) information concerning cellular-originated calls that would assist IXCs in limiting the incidence of toll fraud. An example of the former is information derived through the use of a new technology which stores the unique "electronic fingerprint" of each cellular unit's transmitter along with its associated mobile identification and electronic serial numbers, and can reject calls made from "cloned" phones as unauthorized. An example of the latter is the

ability of cellular carriers to add uniform "information indicator" digits to the "automatic number identification" (ANI) data transmitted with a cellular-originated call.

Cellular fraud remains a major problem on an industry-wide basis. MCI understands that the systems being developed for broadband PCS are designed to be far more resistant to cloning, tumbling and other known forms of fraudulent use. However, even with the best efforts of all concerned, fraud is likely to remain a significant concern for CMRS over the long term. Therefore, the Commission should require that all cellular carriers and other CMRS licensees subject to equal access requirements offer, pursuant to Title II and on reasonable and non-discriminatory terms and conditions, all information necessary for billing and collection of charges for IXC services and for the prevention of fraudulent use.

B. Interconnection: LEC-to-CMRS

MCI's position on LEC-to-CMRS interconnection issues was set forth in considerable detail in comments submitted in the PCS rulemaking (GEN Docket No. 90-314), in the CMRS rulemaking (GN Docket No. 93-252) and in its pending petition for reconsideration of the Second Report and Order in the CMRS proceeding, filed May 19, 1994. As previously stated, MCI believes that LECs' interconnection offerings for CMRS must be tariffed. Tariffed interconnection offerings will assist in minimizing unlawful discrimination, and they are especially important in those instances where the Commission has proposed to eliminate (BOC cellular) or not to

require (LEC PCS) structural separation between LECs and their wireless affiliates. The principal alternative to tariffing discussed in the notice, a contract-filing requirement, is not an adequate substitute for tariffing, without regard to whether a "most-favored-nation" provision is mandated.

LECs must be required to provide any appropriate form of interconnection upon request. This means that LECs may not limit CMRS providers who are also IXCs to Access Tariff offerings. They may purchase wireless interconnection, end-user or other offerings appropriate to their needs. Non-discrimination is the key, and the Commission must stand ready to enforce this requirement quickly and decisively.^{7/}

The Commission has previously ruled that cellular carriers are to be treated as local exchange co-carriers and are entitled to mutual compensation. MCI has previously expressed its support for the extension of co-carrier status, including mutual compensation, to all CMRS providers, and urges the Commission to reaffirm and implement this policy.

C. Interconnection: CMRS-to-CMRS

CMRS providers are presumptively common carriers and should be required to interconnect with any other common carrier upon reasonable request pursuant to Section 201(a) of the Act.

^{7/}Perhaps at least initially, the Commission should consider adopting a mechanism to promptly address and resolve any controversies that may arise. Relegation of these conflicts to the complaint process would be a mistake.


MCI supports the extension of the Commission's basic cellular resale policy to all CMRS. There should be no unreasonable restriction imposed on the resale of CMRS or any other Title II service. MCI intends to review the initial comments submitted by other parties concerning various resale issues, including resale by facilities-based competitors, and to submit its views as appropriate in the reply round.

III. CONCLUSION

For the reasons set forth herein and in MCI's Petition for Rulemaking and Reply Comments in RM-8012, MCI respectfully requests that the Commission: promptly implement equal access requirements for cellular licensees and for all similarly-situated providers of CMRS; extend the existing requirements for LEC interconnection with common carrier mobile licensees (including reciprocal compensation) to include all CMRS providers; and adopt policies and rules governing CMRS-to-CMRS interconnection based upon the traditional common carrier model.

Respectfully submitted,
MCI TELECOMMUNICATIONS CORPORATION

By:


Larry A. Blosser
Donald J. Elardo
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
(202) 887-2727

Its Attorneys

Dated: September 12, 1994

CERTIFICATE OF SERVICE

I, Karen Dove, do hereby certify that on this 12th day of September, 1994, copies of the foregoing "**Comments**" in CC Docket No. 94-54 were served by first-class mail, postage prepaid, unless otherwise indicated, upon the parties on the attached list.

*Hand Delivered



Karen Dove

Stephen M. Shapiro
Mayer, Brown & Platt
190 South LaSalle Street
Chicago, IL 60603

Michael K. Kellogg
Mayer, Brown & Platt
2000 Pennsylvania Ave., N.W.
Washington, D.C. 20006

Thomas P. Hester
Alan N. Baker
AMERITECH
2000 W. Ameritech Center Dr.
Hoffman Estates, IL 60196

Raymond F. Burke
Gerald E. Murray
Edward R. Wholl
NYNEX Corporation
1113 Westchester Avenue
White Plains, NY 10604

Charles P. Russ
Stuart S. Gunckel
Joseph C. O'Neill
US West, Inc.
7800 East Orchard Road
Engelwood, CO 80111

James D. Ellis
William J. Free
Mark P. Royer
Southwestern Bell Corporation
One Bell Center, Room 3512
St. Louis, MO 63101-3099

William B. Barfield
Charles P. Featherstun
BellSouth Corporation
1155 Peachtree Street, N.E.
Suite 1800
Atlanta, GA 30367

Richard W. Odgers
Randall E. Cape
Kristin A. Ohlson
Pacific Telesis Group
130 Kearny Street
Suite 3651
San Francisco, CA 94108

James L. Wurtz
1275 Pennsylvania Ave., N.W.
Suite 400
Washington, D.C. 20004

Josephine S. Trubek
Rochester Telephone Mobile
Communications
180 South Clinton Avenue
Rochester, NY 14646

Michael J. Shortley, III
Rochester Tel Center
180 South Clinton Avenue
Rochester, NY 14646-0700

Roy L. Morris
Deputy General Counsel
Allnet Communications Services,
Inc.
1990 M Street, N.W.
Suite 500
Washington, D.C. 20036

Michael F. Altschul
General Counsel
Cellular Telecommunications
Industry Association
1133 21st Street, N.W.
Third Floor
Washington, D.C. 20036

Arthur Blooston
Robert M. Jackson
Gerard J. Duffy
Blooston, Mordkofsky, Jackson
& Dickens
2120 L Street, N.W. - Suite 300
Washington, D.C. 20037

John M. Goodman
Bell Atlantic
1710 H Street, N.W.
Washington, D.C. 20006

David L. Nace
Marci E. Greenstein
Lukas, McGowan, Nace &
Gutierrez, Chartered
1819 H Street, N.W.
Seventh Floor
Washington, D.C. 20006

Carolyn C. Hill
Federal Regulatory Counsel
Alltel Service Corporation
1710 Rhode Island Ave, N.W.
Suite 1000
Washington, D.C. 20036

David P. Condit
Leonard J. Cali
American Telephone & Telegraph
Company
Room 3244J1
295 North Maple Avenue
Basking Ridge, NJ 07920

Peter Arth, Jr.
Edward W. O'Neill
Helen M. Mickiewicz
California Public Utilities
Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Craig A. Glazer, Chairman
Public Utilities Commission of
Ohio
180 East Broad Street
Columbus, OH 43266-0573

Peter M. Connolly
Koteen and Naftalin
1150 Connecticut Avenue N.W.
Washington, D.C. 20036

Brenda L. Fox
Leonard J. Kennedy
Laura H. Phillips
Dow, Lohnes & Albertson
1225 23rd Street, N.W.
Washington, D.C. 20037

Brian K. Sulmonetti
Director, Regulatory Affairs
Advanced Telecommunications
Corporation
1515 S. Federal Highway.
Suite 400
Boca Raton, FL 33432-7404

Catherine Reiss Sloan
Vice President, Federal Affairs
LDDS Communications, Inc.
1825 I Street, N.W.
Suite 400
Washington, D.C. 20006

Lisa M. Zaina, General Counsel
The Organization for the
Protection and Advancement of
Small Telephone Companies
2000 K Street, N.W., Suite 205
Washington, D.C. 20006

Bob F. McCoy
Joseph W. Miller
Lisa E. Manning
WilTel, Inc.
Suite 3600
P.O. Box 2400
One Williams Center
Tulsa, OK 74102

John S. Logan
J.G. Harrington
Jonathan M. Levy
Dow, Lohnes & Albertson
Suite 500
1255 23rd Street, N.W.
Washington, D.C. 20037

Thomas Gutierrez
Lukas, McGowan, Nace
& Gutierrez, Chartered
1819 H Street, N.W.
Seventh Floor
Washington, D.C. 20006

Kevin C. Gallagher
Vice President
Legal/External Affairs
and Assistant Secretary
Centel Cellular Company
8725 Higgins Road
Chicago, IL 60631

Genevieve Morelli
Competitive Telecommunications
Association
1140 Connecticut Ave., N.W.
Suite 220
Washington, D.C. 20036

Lawrence J. Movshin
William F. Hughes
Thelen, Marrin, Johnson
& Bridges
805 15th Street, N.W.
Suite 900
Washington, D.C. 20005

Gail L. Polivy
GTE Services Corporation
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

R. Michael Senkowski
Jeffrey S. Linder
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

Cathleen A. Massey
Regulatory Counsel
McCaw Cellular Communications
Inc.
1250 Connecticut Ave., N.W.
Suite 401
Washington, D.C. 20036

Marsha Olch
Director - External Affairs
McCaw Cellular Communications,
Inc.
5400 Carillon Point
Kirkland, WA 98033

David Cosson
NTCA
2626 Pennsylvania Ave., N.W.
Washington, D.C. 20037

Stephen M. Shapiro
Senior Vice President
OCOM Corporation
480 East Wilson Bridge Road
Worthington, OH 43085

M. John Bowen, Jr.
John W. Hunter
McNair Law Firm, P.A.
1155 Fifteenth Street, N.W.
Washington, D.C. 20005

Wayne Watts
Linda Hood
Southwestern Bell Mobile
Systems, Inc.
17330 Preston Rd., Suite 100A
Dallas, TX 75222

Leon M. Kestenbaum
Phyllis A. Whitten
Sprint Communications Company
1850 M Street, NW., 11th Floor
Washington, D.C. 20036

Paul C. Besozzi
Besozzi & Gavin
1901 L Street, N.W., Suite 200
Washington, D.C. 20036

Richard M. Tettelbaum
Gurman, Kurtis, Blask and
Freedman, Chartered
1400 Sixteenth Street
Suite 500
Washington, D.C. 20036

Anne U. MacClintock
SNET Cellular, Inc.
227 Church Street
Room 1003
New Haven, CT 06510

William J. Cowan
General Counsel
New York Department of
Public Service
Three Empire State Plaza
Albany, NY 12223

David A. Reams
President and General Counsel
Grand Broadcasting Corporaiton
P.O. Box 502
Perrysburg, OH 43552

Paul Rodgers
Charles D. Gray
James Bradford Ramsay
NARUC
1102 ICC Building
P.O. Box 684
Washington, D.C. 20044

Deborah Lipoff
Rand, McNally & Company
8255 North Central Park
Skokie, IL 60076

Ernest T. Sanchez
Baker & McKenzie
815 Connecticut Ave., N.W.
Suite 900
Washington, D.C. 20006

Emily C. Hewitt
Vincent L. Crivella
Michael J. Ettner
Tenley A. Carp
General Services Administration
18th & F Streets, N.W.
Room 4002
Washington, D.C. 20405

Gerry Vaughan
Federal Communications
Commission
2025 M Street, N.W.
Room 5102
Washington, D.C. 20554

Kathleen Wallman, Chief*
Common Carrier Bureau
Federal Communications
Commission
1919 M Street, N.W.
Room 500
Washington, D.C. 20554